

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth and ERS.

**ORDER GRANTING FOUR HUNDRED TWENTY-NINTH OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO TO NO LIABILITY CLAIMS FILED BY AEELA
MEMBERS**

Upon the *Four Hundred Twenty-Ninth Omnibus Objection (Substantive) of the
Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the
Commonwealth of Puerto Rico to No Liability Claims Filed by AEELA Members* [ECF No. 20485]
(the “Four Hundred Twenty-Ninth Omnibus Objection”),² filed by the Commonwealth of Puerto

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Twenty-Ninth Omnibus Objection.

Rico (“Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated April 1, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Twenty-Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Twenty-Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Twenty-Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified (each, a “Claim to Be Disallowed”, and collectively, the “Claims to Be Disallowed”) in Exhibit A to the Four Hundred Twenty-Ninth Omnibus Objection asserting claims for which the Debtors are not liable; and the Court having determined that the relief sought in the Four Hundred Twenty-Ninth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Twenty-Ninth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Twenty-Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 20485 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Twenty-Ninth Omnibus Objection

Four Hundred Twenty-Nine Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ALVAREZ VALDES, HAYDEE M. VILLA AURORA CALLE 2 A-1 CATANO, PR 00962	6/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	96846-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
2	ALVAREZ VALDEZ, HAYDEE M. A-1 CALLE 2 VILLA AURORA CATANO, PR 00962	6/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	144186	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
3	MARCUCCI GUTIERREZ, MYRNA M URBANIZACION SAN JOAQUIN CALLE TEODORO FIGUEROA #26 ADJUNTAS, PR 00601	6/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	74339-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
4	MIRANDA ROLON , LOURDES MAVILLAS HC-01 BOX 3656 COROZAL, PR 00783	6/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	72935-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
5	MIRANDA VALENTIN, DAMARIS 7107 TRIPOLI WAY ORLANDO, FL 32822	6/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	70860-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						

Four Hundred Twenty-Nine Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
6	RODRIGUEZ GUZMAN, JOSEFINA HC 45 BOX 10039 CAYEY, PR 00736	6/7/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	90371-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Employees Retirement System of the Government of the Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
7	RODRIGUEZ VAZQUEZ, VICTOR M. P.M.B. 538 PO BOX 7105 PONCE, PR 00732	6/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	57422-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings.						
8	ROSADO PACHECO, ANA M. 2551 TENERIFE-VILLA DEL CARMEN PONCE, PR 00716	6/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	82032-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
9	VAZQUEZ CINTRON, MARIA URB. LA RIVIERA C/1 B-17 ARROYO, PR 00714	11/17/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	178822-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
					TOTAL	Undetermined*